



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

W. Tayloe Murphy, Jr.  
Secretary of Natural Resources

5636 Southern Boulevard  
Virginia Beach, VA 23462  
[www.deq.state.va.us](http://www.deq.state.va.us)

Robert G. Burnley,  
Director

Francis L. Daniel  
Tidewater Regional Director  
(757) 518-2000

### MEMORANDUM

**DATE:** August 28, 2002

**TO:** Claire Ballard, DEQ, OTA

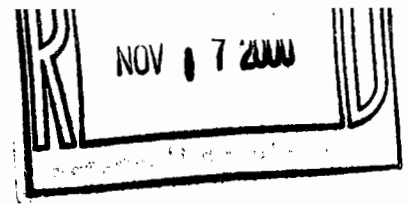
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**FROM:** Lisa A. Silvia, Environmental Inspector Senior, Tidewater Regional Office

**RE:** EPA ID #VAD003174836  
Abex Corporation Portsmouth, Portsmouth  
EPA CERCLA Site Visit

A handwritten signature in cursive script, appearing to read "Lisa Silvia", written in dark ink.

On August 28, 2002, Randy Sturgeon, EPA Region 3 RPM, Dave Gillispie, DEQ Office of Remedial Programs, and I visited the referenced site as part of EPA's five-year review field visit for CERCLA operable unit (OU)-1. We also discussed the areas currently under investigation for OU-2. I reviewed past and future field activities (investigatory and remedial) with respect to compliance with the VHWMR, as applicable to this CERCLA site. Some on-site soil treatment, with possible off-site transport of hazardous waste was reviewed.



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

James S. Gilmore, III  
Governor

John Paul Woodley, Jr.  
Secretary of Natural Resources

5636 Southern Boulevard  
Virginia Beach, VA 23462  
Tel# (757) 518-2000  
<http://www.deq.state.va.us>

Fax (757) 518-2003

November 15, 2000

Dennis H. Treacy  
Director

Francis L. Danie  
Tidewater Regional Director

Mr. William W. Dunnell, IV  
Project Manager  
Haley & Aldrich, Inc.  
150 Mineral Springs Drive  
Dover, New Jersey 07801-1635

**RE: EPA ID# VAD003174836**  
**Abex Corporation Portsmouth**  
**614 Randolph Street**  
**Portsmouth**

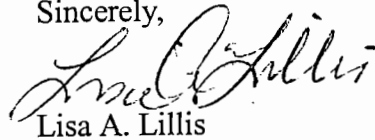
Dear Mr. Dunnell:

On November 6, 2000, I attempted to conduct a RCRA Hazardous Waste Compliance Evaluation Inspection (CEI) at the referenced facility. No site activities were being conducted during my site visit. However, it is noted that the facility is classified as a **LARGE QUANTITY GENERATOR (aka GENERATOR)** of hazardous waste. Based on information available, the facility appears to be in compliance with the applicable requirements of the Virginia Hazardous Waste Management Regulations (VHWMR). A copy of the survey sheet used during this inspection is enclosed for your information. (As no activity has occurred at the site since early calendar year 2000, no inspection checklists were completed for this fiscal year 2001 CEI report. Please refer to the fiscal year 1999 CEI report by DEQ-TRO, dated September 7, 1999, for compliance with generator general, manifest, land ban, and pre-transport requirements.)

Mr. William W. Dunnell, IV  
November 15, 2000  
Page 2 of 2

As previously requested in the fiscal year 1999 CEI report, please submit the project closure report when completed, to verify the quantities of waste removed and treated and the final deposition of hazardous waste. Please contact me at (757) 518-2175 if you have any questions about the content of this letter or need additional guidance in achieving or maintaining compliance.

Sincerely,



Lisa A. Lillis  
Environmental Inspector Senior

Enclosures

c:

Christian Braun, DEQ, OTA

File

# DEPARTMENT OF ENVIRONMENTAL QUALITY

## SURVEY SHEET FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

NAME of FACILITY: **Abex Corporation Portsmouth**

ADDRESS: 614 Randolph Street  
Portsmouth, VA 23707

EPA ID NUMBER: **VAD003174836**

FACILITY  
REPRESENTATIVE: William W. Dunnell, IV

TITLE: Project Manager, Haley & Aldrich

TELEPHONE NUMBER: (973) 366-4786, ext. 3120

INSPECTOR'S NAME: Lisa A. Lillis

TITLE: Environmental Inspector Senior

DATE of INSPECTION: November 6, 2000

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.)

Abex Corporation operated a foundry at this location from 1928 until 1978. The facility produced journal bearings for rail cars. In August 1990, the site was listed on the CERCLA's National Priorities List. The EPA CERCLA Program identified high concentrations of lead in foundry waste, process area soils, and in off-site soils in residential areas adjacent or near to the site. Pneumo Abex Corporation has taken the lead as responsible party on the site remediation project. Oversight of the Remedial Action is being conducted by Haley and Aldrich and the EPA. No activity was occurring as of the day of this inspection; however possible future activity is planned.

2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.

No hazardous waste has been generated and transported off site in CY00; all CY00 lead-contaminated soils were treated on site and removed from the site under manifest as non-hazardous waste/non-RCRA regulated. In CY99, the following hazardous waste was generated, according to the site's 1999 Hazardous Waste Report (dated 3/3/00):

- 1) Lead-contaminated construction debris – D008 (sent for off-site treatment/disposal)
- 2) Lead-contaminated soil – D008 (treated on site)

3. List the highest amounts of hazardous waste ever generated in any month of the calendar year and the greatest amount ever accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
1)	933 cu. yd	933 cu. yd.
1)	304.8 ton	304.8 ton
2)	(undetermined)	27,530.3 ton

4. Does the facility ever generate greater than:  
1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)?
- NO

100 kg of clean-up from a spill of P listed waste or F020-F023 and F026-F027 waste?

NO

If yes, then the facility is a large quantity generator.

5. How is the waste presently being handled? Where is it sent? (List all transporters and facilities, or on-site treatment performed).

**Disposal Facilities:** (waste stream #1 only)

CWM Chemical Services, LLC  
Model City, NY

EPA ID #NYD049836679

USL City Environmental Inc.  
Detroit, MI

EPA ID #MID980991566

Note: Waste stream #2 is treated on site and sent for disposal in a RCRA Subtitle D landfill.

6. Does the facility generate any hazardous waste that is excluded from regulation? If **yes**, list the waste and the basis for exclusion. NO

7. Does the facility:

**Generate**

**Market**

**Burn**

used oil that is burned for energy recovery? **Underline or circle all that are applicable.** (If the facility **markets** or burns used oil, fill out the **Used Oil Checklist.**)

NO

Does the generator of used oil to be burned for energy recovery (other than a **Conditionally Exempt Small Quantity Generator**) mix the used oil with hazardous waste? If **YES**, then fill out the **Used Oil Checklist.**

N/A

8. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? NO

If **Yes**, list the waste, where it is sent, and complete the **Metals Recovery Checklist.**

9. Does the facility generate, transport, store, collect or reclaim spent lead-acid batteries? If **yes**, Underline or circle all that are applicable. If the facility stores batteries before reclaiming them, complete the **Metals Recovery Checklist.** NO

10. Based on the above, the facility is a:

- a. conditionally exempt small quantity generator
- b. small quantity generator
- c. **GENERATOR\***
- d. permitted or interim status TSD
- e. unpermitted TSD (explain in comments section)
- f. transporter
- g. other: please explain \_\_\_\_\_

[Underline or **Circle** All That Are Applicable]

\*No hazardous waste has been generated and transported off site since 1999. All site activities ceased in early CY00. At the request of the facility, however, the generator status will be retained in the event of future episodic generation.

11. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5-55-gallon drums) of non-acute hazardous waste, at which time the accumulation time (180 days or 270 days) for small quantity generators begin.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

12. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.]

Location	Number of Containers	Number of Tanks	Capacity
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No accumulation areas at the site; no site activity.

**13. Comments:**

As a CERCLA site, the facility is relieved of the administrative requirements of RCRA generators while under the oversight of an EPA OSC or RPM. No hazardous waste has been transported off site since 1999. All hazardous waste (lead-contaminated soils) generated in CY00 have been treated on site and sent for disposal in a RCRA Subtitle D landfill. DEQ-TRO requests a copy of the final project closure report when completed.

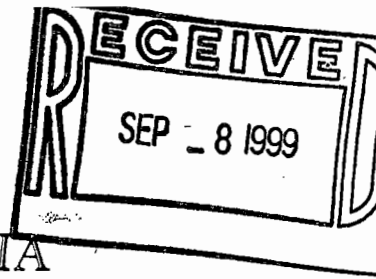
As no activity has occurred at the site since early CY00, no checklists were completed for this FY01 CEI report. Please see the FY99 CEI report by DEQ-TRO, dated September 7, 1999, for compliance with generator general, manifest, land ban, and pre-transport requirements.

**14. Waste Management Flow Diagram:**

(Sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

Based on EPA approval under the CERCLA ROD, lead-contaminated soil is treated on site. Only material that can not be placed in the treatment unit is transported off-site for treatment or disposal in a RCRA Subtitle C facility, such as lead-contaminated construction debris. Treated soil is disposed in a RCRA Subtitle D landfill.





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FAX (757) 518-2003

Dennis H. Treacy  
Director

Francis L. Daniel  
Tidewater Regional Director

September 7, 1999

Mr. William W. Dunnell IV  
Project Manager  
Haley & Aldrich  
150 Mineral Spring Drive  
Dover, New Jersey 07801-1635

**Re: EPA ID #VAD003174836  
Abex Corporation Portsmouth  
614 Randolph Street  
Portsmouth**

Dear Mr. Dunnell:

On August 11, 1999, I conducted a RCRA Hazardous Waste Compliance Inspection at the referenced facility. The facility is classified as a **LARGE QUANTITY GENERATOR (LQG)**. Based on the information obtained during the inspection, the facility appears to be in compliance with the applicable requirements in the Virginia Hazardous Waste Management Regulations (VHWMR) 9 VAC 20-60-10 *et seq.*

Since the site closed in 1978, the responsible party is not required to meet all the requirements under RCRA. DEQ- Tidewater Regional Office requests the responsible party submit the project closure report to verify the quantities of waste removed and treated and the final deposition of hazardous waste. If you have any question, please contact me at (757) 518-2188.

Sincerely,

Lora B. Fly

Enforcement Compliance Specialist, Sr.

c: Claire Ballard, DEQ, OTA  
File

# DEPARTMENT OF ENVIRONMENTAL QUALITY

## SURVEY SHEET FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

NAME of FACILITY: ABEX Corportation Portsmouth

ADDRESS: 614 Randolph Street  
Portsmouth, Virginia 23707

EPA ID NUMBER: VAD003174836

FACILITY  
REPRESENTATIVE: William W. Dunnell

TITLE: Project Manager

TELEPHONE NUMBER: (973) 366-4786

INSPECTOR'S NAME: Lora B. Fly

TITLE: Enforcement Compliance Specialist, Sr.

DATE of INSPECTION: August 11, 1999

---

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.)

The Abex CERCLA site operated as a foundry that made journal bearings for rail road cars from 1928 to 1978. In 1986, EPA identified high lead concentrations in the foundry waste, in soil around the process area and in off-site soil in residential lots next to the site. Oversight of the remedial action is being conduct by Haley & Aldrich and EPA.

2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.

D008 - Lead contaminated soil, asphalt, concrete

3. List the highest amounts of hazardous waste ever generated in any month of the calendar year and the greatest amount ever accumulated at the site of each type of waste generated.

<u>Waste Code</u>	<u>Amount Generated</u>	<u>Amount Accumulated</u>
D008	450 tons	450 tons

4. Does the facility ever generate greater than:  
1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)? NO

100 kg of clean-up from a spill of P listed waste or F020-F023 and F026-F027 waste? NO  
If yes, then the facility is a large quantity generator.

5. How is the waste presently being handled? Where is it sent? (List all transporters and facilities, or on-site treatment performed).

TRANSPORTER

Horwith Trucking, Inc.	PAD146714878
Price Trucking Corp.	NYD046765574
Page Etc., Inc.	NYD986969947
Dart Trucking Company	OHD009866826

DISPOSAL FACILITY

CWM Chemical Services, L.L.C.	Model City, NY	NYD049836679
Michigan Disposal Inc.	Beltville, MI	MID000724831

6. Does the facility generate any hazardous waste that is excluded from regulation? If yes, list the waste and the basis for exclusion. NO

7. Does the facility:

Generate	Market	Burn
----------	--------	------

used oil that is burned for energy recovery? Underline  
or circle all that are applicable. (If the facility

markets or burns used oil, fill out the  
**Used Oil Checklist.**)

NO

Does the generator of used oil to be burned for energy recovery (other than a **Conditionally Exempt Small Quantity Generator**) mix the used oil with hazardous waste? If **YES**, then fill out the **Used Oil Checklist**.

NO

8. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these?

NO

If **Yes**, list the waste, where it is sent, and complete the **Metals Recovery Checklist**.

9. Does the facility generate, transport, store, collect or reclaim spent lead-acid batteries? If **yes**, Underline or **circle** all that are applicable. If the facility stores batteries before reclaiming them, complete the **Metals Recovery Checklist**.

NO

10. Based on the above, the facility is a:

- a. conditionally exempt small quantity generator
- b. small quantity generator
- c. generator
- d. permitted or interim status TSD
- e. unpermitted TSD (explain in comments section)
- f. transporter
- g. other: please explain \_\_\_\_\_

[Underline or **Circle** All That Are Applicable]

11. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5-55-gallon drums) of non-acute hazardous waste, at which time the accumulation time (180 days or 270 days) for small quantity generators begin.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

12. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.]

Location	Number of Containers	Number of Tanks	Capacity
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There are no identified accumulation areas at the site.

13. Comments:

CERCLA sites are relieved of administrative regulations. Therefore, Abex is not required to complete the annual/biannual report. DEQ-TRO requests a copy of the final closure project report when complete

14. Waste Management Flow Diagram:

(Sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

Based on EPA's approval, lead contaminated soil is treated on site. Only material that can not be placed in the treatment until will be taken off-site for disposal in an approved subtitle C landfill.

# DEPARTMENT OF ENVIRONMENTAL QUALITY

## CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF LARGE QUANTITY GENERATORS (LQG)

FACILITY NAME: Abex Corporation Portsmouth

EPA ID NUMBER: VAD003174836

INSPECTION DATE: August 11, 1999

**NOTE:** \* means Non-Compliance

### VIRGINIA HAZARDOUS WASTE MANAGEMENT REGULATIONS

PART/ SECTION	REGULATION	YES	NO	N/A
6.3.	1. Is a manifest system currently being used for all hazardous waste shipped off site?	X		
6.2.C.	2. Has the generator determined that the facility has an EPA ID number?	X		
5.5.A.7.	3. Has the generator determined that the transporter has a valid EPA ID number and a valid Virginia Transporter permit?	X		
6.3. 5.3.B.	4. Is the following information on the manifest:			
5.3.B.1.	A. The generator's name, mailing address, EPA ID number, and telephone number?	X		
5.3.B.2.	B. A unique five digit number assigned to the manifest by the generator?	X		
5.3.B.3.	C. The total number of pages of the manifest?	X		
5.3.B.4.	D. The company name and EPA ID number of each transporter used?	X		
5.3.B.5.	E. The company name, site address, and EPA ID number of the facility designated to receive the waste?	X		

PART/ SECTION	REGULATION	YES	NO	N/A
5.3.B.6.	F. The U.S. DOT description of each waste to include its proper shipping name, hazard class, and I.D. number (UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material?	X		
5.3.B.7.	G. The quantities of waste being shipped? and	X		
5.3.C.	H. The following certification:  I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment. <b>OR</b> , If I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.	X		
6.5.C.1.b.	5. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago? The facility had all return copies from the TSD for 1999. The return copies for 1997 were sent to the home office in New York.	X		
6.5.C.1.b.	6. If no, has the generator filed an exception report with the Executive Director?	X		
6.5.C.1.b.	7. Does the exception report include:			
6.5.C.1.b.(1)	A. A legible copy of the manifest for which the generator does not have confirmation of the delivery? and			X
6.5.C.1.b.(2)	B. A cover letter explaining the efforts taken to locate the shipment?			X
6.4.E.1.d. 9.1.G.1.	8. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? All contractors on site have fulfilled the OSHA and Hazwopper requirements to conduct the clean-up	X		
9.1.G.2.	9. Have new employees to the facility successfully completed training mentioned above within six months of their employment or assignment to the facility?			X
9.1.G.3.	10. Do personnel participate in an annual review of the initial training?			X
9.1.G.4.	11. Does the owner/operator maintain the following documents and records at the facility:			

PART/ SECTION	REGULATION	YES	NO	N/A
9.1.G.4.a.	A. Job titles for each position at the facility related to hazardous waste management?			X
9.1.G.4.a.	B. The name of the employee filling each job?			X
9.1.G.4.b.	C. A written job description for each position in 11.A. above?			X
9.1.G.4.c.	D. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in 11.A. above? and,			X
9.1.G.4.d.	E. Records that document that the training or job experience required above has been given to, and completed by facility personnel?			X
6.4.E.1.d. 9.2.B. 9.2.D.	12. At the facility, is the following equipment installed:			
9.2.B.1.	A. An internal communications or alarm system capable of providing immediate emergency instruction to facility personnel if the hazardous waste generation or accumulation areas are threatened by hazardous waste release, fire or explosion? Hand held radios, cell phones	X		
9.2.B.2.	B. A device (at the scene of hazardous waste generator operations) capable of summoning emergency assistance from Police, Fire Departments, etc.? Cell phones, telephones	X		
9.2.B.3.	C. <b>Portable fire extinguishers</b> , fire control equipment and decontamination equipment? and	X		
9.2.B.4.	D. Water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system?	X		
9.2.C.	13. Is the above equipment tested and maintained as necessary to assure proper operation and is a record of the tests and inspections maintained on a log at the facility? Tags on fire extinguishers	X		
9.2.E.	14. Does the facility have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies?	X		
6.4.E.1.d. 9.1.F.4.	15. Does the generator record inspections of the accumulation area at his facility in an inspection log?			X
9.2.F.1.	16. Has the facility attempted to arrange agreements with the local authorities such that:			
9.2.F.1.a.	A. The police, fire and emergency response teams are familiar with the layout of the site, the properties of the hazardous waste handled at the site, normal working areas, entrances to roads inside the facility and possible evacuation routes? All information in the Health&Safety Plan	X		



PART/ SECTION	REGULATION	YES	NO	N/A
9.2.F.1.b.	B. Where more than one police and fire department might respond to an emergency, do agreements specify a primary emergency authority?			X
9.2.F.1.c.	C. Agreements with Commonwealth emergency response teams, emergency response contractors and equipment suppliers are specified? and	X		
9.2.F.1.d.	D. The local hospital is familiar with the properties of the hazardous wastes handled and the types of injuries or illnesses which could result from fires, explosions, or releases?	X		
6.4.E.1.d. 9.3.A.1.	17. Does the facility have an established contingency plan to deal with any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, ground water or surface water? All information in Health & Safety Plan	X		
9.3.B.	18. Does the contingency plan contain the following elements:			
9.3.B.(1,2)	A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, and water? All information in Health and Safety Plan	X		
9.3.B.3.	B. A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors and Commonwealth and local emergency response teams to coordinate emergency services, as required?	X		
9.3.B.4.	C. A listing of names, addresses, and office and home phone numbers of all persons qualified to act as emergency coordinator? List primary Coordinator.  <b>NAME:</b> Brendon LaPort <b>TITLE:</b> Health and Safety Officer On-site clean up contractor	X		
9.3.B.5.	D. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? Does this list of emergency equipment specify the location and physical description of each item on the list and a brief outline of its capabilities?	X		
9.3.B.6.	E. An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? and	X		
9.3.C.2.	F. Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams?			X
9.3.F.	19. Has the contingency plan ever been implemented?		X	
9.3.F.(9,10)	20. If yes, was a written report filed with the Director within 15 days and were the Director and other required authorities properly notified before operations resumed?			X

PART/ SECTION	REGULATION		YES	NO	N/A
6.5.A.1., 2., & 3.	21.	Does the generator retain copies of all manifests, annual reports, exception reports, test results, and waste analysis for at least three years?	X		
6.5.B.1.	22.	Has the facility submitted an annual report for the preceding calendar year by March 1? Since the site is under Superfund, the facility is not required to submit an annual report.			X
6.4.E.7.	23.	Does the generator who manages HW prohibited under Part XV treat waste in tanks and containers? If yes, must meet requirements of 6.4.E. and 15.1.G.1.d.	X		
15.1.G.1.d.	24.	If the generator treats waste in tanks or containers, has the generator developed a written waste analysis plan and kept on-site in the generator's records. Has the generator filed a plan with director at least 30 days prior to treatment.	X		
6.5.D.	25.	Has the generator ever submitted a release report if responsible for release of HW which threatens public health. (Must notify NRC, local Government, the Department.)		X	
6.4.E.2.	26.	Does the generator accumulate (store) hazardous waste in containers or tanks on-site for greater than 90 days? If yes, interim status or a TSD permit is required. (Up to a 30 day extension may be granted by the Director.)		X	
6.4.E.1.e.	27.	Has the generator notified the Executive Director by March 1, 1988, of the exact location of the existing container and tank accumulation areas, and at least 15 days prior to use for subsequently established accumulation areas?			X
6.4.E.1.a.(1) 9.8.	28.	The Use and Management of Containers for 90 Day Accumulation Areas: The facility has no established 90-day areas			
6.4.E.1.a 9.8.B.	29.	Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation? If <b>No</b> , list the accumulation areas where there are problems and the type of problems.			X
6.4.E.1.a. 9.8.C.	30.	Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored?			X
6.4.E.1.b.	31.	Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container?			X
6.4.E.1.c.	32.	Is the container labeled or marked clearly with the words "Hazardous Waste".			X
9.8.D.1.	33.	Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste? If <b>No</b> , list the locations where open containers are found.			X
9.8.E.	34.	Are the areas where hazardous waste containers are stored inspected by the owner/operator at least weekly?			X

PART/ SECTION	REGULATION	YES	NO	N/A
9.8.F.	35. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line?			X
9.8.G.1.	36. Are incompatible wastes placed in separate containers?			X
9.8.G.3.	37. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices?			X
6.4.E.3.a.	38. Does the generator have satellite accumulation areas where up to 55 gal of any one type of HW (1 QT acutely HW) are accumulated? If yes,			X
6.4.E.3.a.	A. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate?			X
6.4.E.3.a.(1) 9.8.B.	B. Are the containers in good condition?			X
6.4.E.3.a.(1) 9.8.C.	C. Are the containers compatible with the waste?			X
6.4.E.3.a.(1) 9.8.D.1.	D. Are the containers kept closed except as necessary to add or remove waste?			X
6.4.E.3.a.(2)	E. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container? and			X
6.4.E.3.b.	F. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,			X
6.4.E.3.b.	1) Has the generator marked the excess amount with the date the excess amount began accumulating?			X
6.4.E.3.b.	2) Has the generator either removed the excess amount within three days of the date of excess accumulations or has he complied with all other provisions for accumulation areas? Namely, has he notified the Executive Director about the location of the accumulation area?			X
	39. <b>PLEASE LIST ANY NEWLY REGULATED WASTE THAT IS NOT LAND RESTRICTED (such as D018-D043, F032, F034 or F035) ON THE LAST PAGE UNDER "COMMENTS".</b>			
15.1.A.2.	40. Does the facility generate, transport, treat, store or dispose any land-restricted wastes? (See VHWMR Part 15)	X		
15.1.A.3.	41. Is land disposal of wastes occurring? If yes,		X	
15.1.A.3.a.	A. Has the facility been granted an extension to the effective date for land restriction applicable to its restricted waste? OR			X
15.1.A.3.b.	B. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? OR			X

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.A.3.c.	C. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?			X
15.1.E.	42. Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction?		X	
15.1.F.	43. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?		X	
15.1.C.1.	44. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?		X	
15.1.D.1.	45. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.)		X	
	46. If yes, does the facility meet the following requirements:			
15.1.D.1.b. 15.1.G. 15.3.C. 15.4. 15.3.	A. Are the residues of the treatment analyzed as specified in VHWMR § 15.1.G. or § 15.3.C. to determine if they meet the applicable treatment standards or VHWMR § 15.4. or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR § 15.3?			X
15.1.D.1.c. 9.10.B.1. 10.10.B.3.	B. Has the owner/operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liner?			X
15.1.D.1.c. 10.5.	C. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR § 10.5?			X
15.1.D.1.d.	D. Has the owner/operator submitted a written certification to the Executive Director that the requirements of 15.1.D.1.c. have been met which states: "I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted wastes. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment." and			X
15.1.D.1.d.	E. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes accompanied by the above certification?			X

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.G.1.a.	47. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?	X		
	48. Did the notification include the following information:			
15.1.G.1. a.(1)	A. EPA Hazardous Waste Number?	X		
15.1.G.1. a.(2)	B. The corresponding treatment standards and all applicable prohibitions set forth in VHWMR § 15.3.C.?	X		
15.1.G.1. a.(3)	C. The manifest number associated with the shipment of waste? and	X		
15.1.G.1. a.(4)	D. Waste analysis data, where available?	X		
15.1.G. 1.b.	49. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR § 15.3.C.?		X	
	50. Did the notification include the following information:			
15.1.G.1. b.(1)(a)	A. EPA Hazardous Waste Number?			X
15.1.G.1. b.(1)(b)	B. The corresponding treatment standards and all applicable prohibitions?			X
15.1.G.1. b.(1)(c)	C. The manifest number associated with the shipment of waste? and			X
15.1.G.1. b.(1)(d)	D. Waste analysis date, where available?			X
15.1.G.1. b.2.	51. Was the certification signed by an authorized representative, and did it state the following: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR § 15.4. and all applicable prohibitions set forth in VHWMR § 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."			X
15.1.G.1.c.	52. Has the generator received a case-by-case exemption on restricted waste, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?		X	

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.G.1.g.	53. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?	X		
15.5.	54. Is the generator storing land restricted waste? (For one year storage only)		X	
15.5.1.a.	55. If yes, is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal?			X

### Comments

None.

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
WASTE DIVISION**

**CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF  
SUBPART CC FACILITIES (CC)**

**FACILITY NAME:** ABEX Corporation Portsmouth

**EPA ID NUMBER:** VAD003174836

**INSPECTION DATE:** August 11, 1999

**NOTE:** \* means Non-Compliance.

**CODE OF FEDERAL REGULATIONS**

<b>PART/ SECTION</b>	<b>REGULATION</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
40CFR265	GENERAL			
265.1080	1. If the facility claims that the subpart CC regulations are not applicable to their waste management unit(s) or that the unit(s) are exempt from regulation, explain the rationale for the claim in the comments section.		X	
	2. If the waste management unit(s) are exempt because the volatile organic compound (VOC) concentration of the waste is <500 ppmw, does the facility have VOC determination records? (FACILITY MUST HAVE RECORDS.)		X	
	3. Does the facility have a written sample and analysis plan for all waste characterization samples?	X		
265.1089.(e)	4. Does the facility have a written plan and schedule to perform air emission control equipment inspections and monitoring?		X	
265.1090(g)	5. Does the facility maintain inspection records on-site for at least three years from the date of the inspection?		X	
265.1085	TANKS			
265.1090(b)	6. If a fixed-roof tank ( <b>Tank Level 1 Controls</b> ) is used for the storage of a hazardous waste with >500 ppmw VOC, is the maximum vapor pressure determination of the waste maintained in the facility records?			X
265.1085	7. Are all of the tanks for which there is no maximum vapor pressure determination one of the following: fixed roof with internal floating roof, external floating roof, fixed roof vented to a control device, pressure tank, or tank located within an enclosure vented to a control device ( <b>Tank Level 2 Controls</b> ) ?			X
	8. Are tank(s) used for waste stabilization located within an enclosure and vented to a combustion device?			X
265.1087	CONTAINERS			

PART/ SECTION	REGULATION	YES	NO	N/A
265.1087(b)	9. Are the container (s) (>26 gallons) approved for hazardous waste storage by the U.S. Department of Transportation (DOT)?			X
	A. If not DOT approved, and the container is <119 gallons, does the container when closed have no visible holes, gaps, or other open spaces into the interior of the container?			X
	B. If not DOT approved, and the container is >119 gallons, is the container in light material service?			X
265.1087(b)	C. If yes, does the container operate with no detectable organic emissions or has the container been demonstrated to be vapor-tight?			X
265.1087(b)(2)	10. Are any container (s) larger than 26 gallons used for waste stabilization?			X
265.1087(b)(2)	A. If yes, are the container (s) vented to a control device or located within an enclosure vented to a control device?			X
265.1086	SURFACE IMPOUNDMENTS			
265.1086	11. Does the surface impoundment have either a floating membrane cover or a cover vented to a control device?			X

**COMMENTS:**

The facility was not storing hazardous waste on site during the inspection. The facility is currently treating the hazardous waste on site. Consultants at the facility stated the soils at the site were nonhazardous.

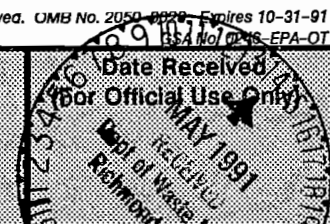


Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



# Notification of Regulated Waste Activity

United States Environmental Protection Agency



## I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒
E. Subsequent Notification  
(complete item C)

C. Installation's EPA ID Number

V A D 0 0 3 1 7 4 8 3 6

## II. Name of Installation (Include company and specific site name)

A B E X - C O R P O R A T I O N - P O R T S M O U T H

## III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

B R I G H T O N &amp; S E V E N T H

Street (continued)

City or Town

P O R T S M O U T H

State

ZIP Code

V A 2 3 7 0 5 -

County Code

County Name

P O R T S M O U T H

## IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

P O B O X 2 9

City or Town

G O S H E N

State

ZIP Code

N Y 1 0 9 2 4 -

## V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

B A S S A N O

(first)

J O H N

Job Title

C O N S U L T A N T

Phone Number (area code and number)

9 1 4 - 2 9 4 - 1 8 1 1

## VI. Installation Contact Address (See Instructions)

A. Contact Address  
Location Mailing
☐
☒

B. Street or P.O. Box

P O B O X 2 9

City or Town

G O S H E N

State

ZIP Code

N Y 1 0 9 2 4 -

## VII. Ownership (See Instructions)

### A. Name of Installation's Legal Owner

A B E X C O R P O R A T I O N

Street, P.O. Box, or Route Number

L I B E R T Y L A N E

City or Town

H A M P T O N

State

ZIP Code

N H 0 3 8 4 2 -

Phone Number (area code and number)

6 0 3 - 9 2 9 - 2 2 8 1

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

No

X

(Date Changed)

Month

Day

Year

ID - For Official Use Only

## VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity		B. Used Oil Fuel Activities	
<input checked="" type="checkbox"/> 1. Generator (See Instructions) <input type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs.) <input type="checkbox"/> b. 100 to 1000 kg/mo (220 - 2,200 lbs.) <input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.) <input type="checkbox"/> 2. Transporter (Indicate Mode in boxes 1-5 below) <input type="checkbox"/> a. For own waste only <input type="checkbox"/> b. For commercial purposes Mode of Transportation <input type="checkbox"/> 1. Air <input type="checkbox"/> 2. Rail <input type="checkbox"/> 3. Highway <input type="checkbox"/> 4. Water <input type="checkbox"/> 5. Other - specify <span style="border: 1px solid black; display: inline-block; width: 150px; height: 1.2em; vertical-align: middle;"></span>	<input type="checkbox"/> 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions. <input type="checkbox"/> 4. Hazardous Waste Fuel <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketers <input type="checkbox"/> c. Burner - indicate device(s) - Type of Combustion Device <input type="checkbox"/> 1. Utility Boiler <input type="checkbox"/> 2. Industrial Boiler <input type="checkbox"/> 3. Industrial Furnace <input type="checkbox"/> 5. Underground Injection Control	<input type="checkbox"/> 1. Off-Specification Used Oil Fuel <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketer <input type="checkbox"/> c. Burner - indicate device(s) - Type of Combustion Device <input type="checkbox"/> 1. Utility Boiler <input type="checkbox"/> 2. Industrial Boiler <input type="checkbox"/> 3. Industrial Furnace <input type="checkbox"/> 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification	

## IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (D000)	(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	D	0	0	8

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

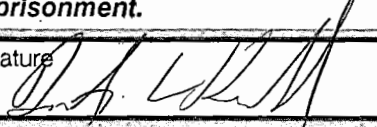
1	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6

## X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature 	Name and Official Title (type or print) Dexter L. Kenfield, Corporate Counsel	Date Signed 5/7/91
--	--	-----------------------

## XI. Comments

GENERAL STATE SECTION

MAY 20 1991

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of EPA 833 booklet for addresses.)

JUL 3 1991

HAZARDOUS WASTE DATA MANAGEMENT SYSTEM  
MAINTENANCE FORM FOR NOTIFICATIONEPA-ID # VA:DO03:1:D:4:8:3:6 DATE: JUN 28 1991FACILITY NAME Alex-Corp RPG

New Facility Name

Alex-Corporation-Portsmouth

Contact Person/Position

Barbara John Consultant 914-294-1811

(Last, First, M) Title Tel No.

MAILING Street P.O. Box 29ADDRESS City Asheem State NY Zip 10924

LOCATION Street \_\_\_\_\_

ADDRESS City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

County Name

County Code

JUL 22 1991

Owner Name

Operator Name

Activity code

☐ Gen ☐ Tr ☐ Tsd  
☐ 5. Market or Burn  
☐ A. Gen Mark to Burn  
☐ B. Other Marketer  
☐ C. Burner

Used Oil Fuel Activities

☐ 6. Off-Spec Use Oil Fuel  
☐ A. Gen Mark to Burn  
☐ B. Other Marketer  
☐ C. Burner  
☐ 7. Spec Used Oil Fuel Mark

Waste Fuel Burn : Type of Coabustice Device

☐ Utility Boiler ☐ Ind. Boiler ☐ Ind. Furnace

Mode of Transportation (Transporters Only)

☐ Air ☐ Rail ☐ Highway ☐ Water ☐ Other

Maintanance SerW1 CardF2 Card

Existing  
Waste  
Code

New  
Waste  
Code

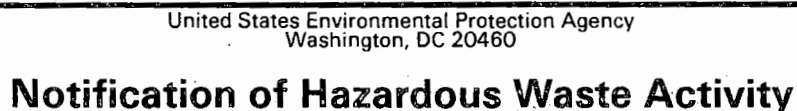
Non-Reg Ind \_\_\_\_\_ (e303)

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DO00  
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\_\_\_\_\_  
\_\_\_\_\_



Please refer to the *Instructions for Filing Notification* before completing this form. The information required here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

## Comments

Installation's EPA ID Number										Approved		Date Received (yr. mo. day)											
C	V	A	D	0	0	3	1	7	4	8	3	6	T/A	C				0	6	0	7	0	3
F														1									

A	b	e	x	C	O	R	P	R	P	G.
---	---	---	---	---	---	---	---	---	---	----

## Street or P.O. Box

City or Town															State	ZIP Code	
C 4	B	U	R	R		R	I	D	G	E						IL	605

## Street or Route Number.

City or Town															State		ZIP Code					
C	P	O	R	T	S	H	O	U	T	H							V	A	2	3	7	

## Name and Title (last, first, and job title)

<b>V. Ownership</b>	
---------------------	--

**A. Name of Installation's Legal Owner**

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

### A. Hazardous Waste Activity

- ☒ 1a. Generator ☐ 1b. Less than 1,000 kg/mo.
- ☐ 2. Transporter
- ☐ 3. Treater/Storer/Disposer
- ☐ 4. Underground Injection
- ☐ 5. Market or Burn Hazardous Waste Fuel  
(enter 'X' and mark appropriate boxes below)
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner

### B. Used Oil Fuel Activities

- ☐ 6. Off-Specification Used Oil Fuel  
(enter 'X' and mark appropriate boxes below)
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner
- ☐ 7. Specification Used Oil Fuel Marketer (or On site Burner)  
Who First Claims the Oil Meets the Specification

**VII. Waste Fuel Burning: Type of Combustion Device** (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

- ☐ A. Utility Boiler      ☐ B. Industrial Boiler      ☐ C. Industrial Furnace

**VIII. Mode of Transportation** (transporters only — enter 'X' in the appropriate box(es))

- ☐ A. Air    ☐ B. Rail    ☐ C. Highway    ☐ D. Water    ☐ E. Other (specify) \_\_\_\_\_

### IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- ☒ A. First Notification      ☐ B. Subsequent Notification (*complete item C*)

C. Installation's EPA ID Number



**X. Description of Hazardous Wastes (continued from front)**

**A. Hazardous Wastes from Nonspecific Sources.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1 0007	2 0008	3	4	5	6
7	8	9	10	11	12

**B. Hazardous Wastes from Specific Sources.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

**C. Commercial Chemical Product Hazardous Wastes.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

**D. Listed Infectious Wastes.** Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

**E. Characteristics of Nonlisted Hazardous Wastes.** Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☐ 1. Ignitable  
(D001)


☐ 2. Corrosive  
(D002)

☐ 3. Reactive  
(D003)

☐ 4. Toxic  
(D000)

**XI. Certification**

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

Signature 	Name and Official Title (type or print) C. H. BORCHERING DIR. ENV. CONTROL	Date Signed 7/2/86
--	--	-----------------------